

North Pacific Marine Radio Council

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October 4, 2004

**Comments by North Pacific
Marine Radio Council concerning:
WT Docket No. 04-257 and
RM-10743**

Secretary
Federal Communications Commission
445 12th Street S.W.
TW-325
Washington, D.C. 20554

The following comments by the North Pacific Marine Radio Council (NPMRC) are in response to WT Docket No. 04-257, released by the Commission on July 30, 2004, and refer to the specific paragraph numbers in the Notice of Proposed Rule Making.

8. It is the position of NPMRC that the land mobile use of the VPC frequencies in areas near navigable waters be restricted to use of equipment type accepted under part 80 to prevent potential interference with vessels operating at sea and in Canadian waters adjacent to the State of Washington.

13. We agree with the Commission that the VPC frequencies should not be reallocated or any action taken to remove this spectrum from the maritime community. Any such action would jeopardize the maritime community's ability to meet it's needed operational, safety and security communications.

14. NPMRC supports the Commission's position to allow the use of VPC frequencies for port operation use on both a simplex and duplex basis.

Consideration should also be given to the use of the VPC frequencies for port and port facility security communications.

Sincerely,

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North Pacific Marine Radio Council

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